

Thomas A. Egan (TE-0141)
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
New York, New York 10006
(212) 412-9500
(212) 964-9200 (Fax)
Attorneys for Defendant
Apollo Enterprise Solutions, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEBT RESOLVE, INC.

Plaintiff,

v.

APOLLO ENTERPRISE SOLUTIONS,
LLC,

Defendant.

SUPPLEMENTAL AFFIDAVIT
OF CHRISTOPHER IMREY IN
SUPPORT OF DEFENDANT'S
REPLY REGARDING ORDER
TO SHOW CAUSE ON
JURISDICTION

Civil Action No. 07-103

AFFIDAVIT OF CHRISTOPHER IMREY

Christopher Imrey hereby declares:

1. I am the President and Chief Executive Officer of Apollo Enterprise Solutions, LLC ("Apollo"), and have personal knowledge as to all matters stated herein.

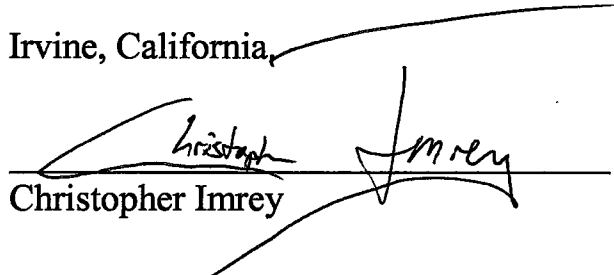
2. I am informed that Debt Resolve contends that Apollo solicited business from MRS Associates who is located in Cherry Hill, New Jersey. This is

incorrect. Apollo did not market directly to MRS Associates or to any other New Jersey company. Rather MRS contacted Apollo over the internet via Apollo's website. MRS requested a web based demonstration of the product. We were informed by MRS that it heard of Apollo from an Apollo advertisement in a nationally distributed publication. During a return trip from London in early 2006 I had a stop over in New York, and stopped by MRS at its offices in New Jersey. We discussed Apollo's product during that meeting. Apollo did not make a sale to MRS.

3. Recently, Apollo has made a sale to a company in New York, but has not yet delivered any product. More than a year ago Apollo also was approached by two other New York companies. We had some preliminary discussions regarding Apollo's product but the discussions did not progress to the point that we made a proposal and we did not make a sale. I did meet with representatives of one of the New York companies in Wilmington, Delaware one time more than a year ago.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 15, 2007 at Irvine, California,



Christopher Imrey